

BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

IN THE MATTER OF ENFORCEMENT	)	PDC CASE NO: 04-421
ACTION AGAINST	)	
	)	STIPULATION OF FACTS
Grays Harbor County Democratic	)	VIOLATIONS AND
Central Committee	)	PENALTY
	)	
Respondent.	)	
_____	)	

The Grays Harbor County Democratic Central Committee (GHCDCC) (Respondent) and the Public Disclosure Commission Staff (Staff) jointly submit this Stipulation of Facts, Violations and Penalty for Commission consideration in lieu of a full enforcement hearing before the Commission. The parties agree that, pursuant to RCW 42.17.360, the Commission has the authority to accept, decline, or to suggest modifications to this Stipulation. In the interest of avoiding further proceedings, the parties enter this Stipulation.

**Facts**

Both parties agree to the following facts:

1. The GHCDCC is a “bona-fide political party organization” as defined in RCW 42.17.020(5), and a “political committee” as defined in RCW 42.17.020 (33).  
The GHCDCC is the bona-fide political party organization operating in Grays Harbor County as designated by the Washington State Democratic Central Committee. The GHCDCC has been registered with the PDC since at least 1996. Betty Strabbing has been the treasurer of the GHCDCC since at least 1996 and is

currently the committee's treasurer. Reports were not filed with the PDC from January 1, 1999 through October 27, 2003.

2. As a political committee, GHCDCC was required to file detailed reports of contributions received on PDC form C-3 and summary reports of contributions received and expenditures made, including details of expenditure activities, on PDC form C-4 and its appropriate schedules.
3. In November 2003, Public Disclosure Commission (PDC) staff received telephone calls inquiring about the lack of reports filed by the GHCDCC. Based on the calls, staff reviewed the filings of the GHCDCC, and determined that reports had not been filed since at least January 1999.
4. At the request of PDC staff, Ms. Strabbing filed the missing C-3 and C-4 reports covering nearly five years. Reports covering the period January 1, 1999 through September 30, 2003 were filed December 1, 2003 and reports covering October 2003 activities were filed December 10, 2003.
5. Ms. Strabbing provided no written or oral explanation for why the reports were not timely filed, but acknowledged that the reports for 1999 through October 2003 were not timely filed, and acknowledged that filing the reports was her responsibility.
6. During the period January 1, 1999 through September 30, 2003, GHCDCC received contributions totaling \$60,881 and made expenditures totaling \$52,327. Reports for these activities were filed from 43 days to over four years late.

7. Of the expenditures made, \$11,800 represented contributions made to candidates and political committees. Specifically, GHCDCC failed to timely file the following:
- a. In 1999, 13 C-3 reports and six C-4 reports showing contributions received of \$12,516 and expenditures made totaling \$6,792. No contributions were made to candidates. The reports were filed more than four years late on December 1, 2003.
  - b. In 2000, 16 C-3 reports and ten C-4 reports showing contributions received of \$16,445 and expenditures made totaling \$13,068. Contributions made to candidates totaled \$3,300. The reports were filed more than three years late on December 1, 2003.
  - c. In 2001, 14 C-3 reports and nine C-4 reports showing contributions received of \$13,089 and expenditures made totaling \$9,074. Contributions made to candidates totaled \$1,000. The reports were filed more than two years late on December 1, 2003.
  - d. In 2002, 14 C-3 reports and eight C-4 reports showing contributions received of \$12,063 and expenditures made totaling \$13,954. Contributions made to candidates totaled \$5,000. The reports were filed more than one year late on December 1, 2003.
  - e. In 2003, 11 C-3 reports and eight C-4 reports showing contributions received of \$6,767 and expenditures made totaling \$9,439. Contributions made to candidates totaled \$2,500. The reports were filed from one to ten months late on December 1, 2003.

### **Violations**

Respondent and Staff agree that based upon the facts stipulated above, the Respondent committed multiple violations of RCW 42.17.080 and 42.17.090:

- by failing to timely file Monetary Contribution reports (PDC form C-3) for contributions received between January 1, 1999 and September 30, 2003 totaling \$60,881; and
- by failing to timely file Summary Contribution and Expenditure Reports (PDC form C-4) disclosing contributions received totaling \$60,881 and expenditures made totaling \$52,327 between January 1, 1999 and October 31, 2003 (including contributions made to candidates and political committee totaling \$11,800).

### **Penalty**

Respondent and Staff agree that based upon the facts and the agreement regarding violations of RCW 42.17 above, the Respondent accepts an assessed total civil penalty of five thousand dollars (\$5,000). Two thousand five hundred dollars (\$2,500) will be suspended provided GHCDCC is not found in violation of any section of RCW 42.17 for four years from the date of entry of the Commission's Final Order in this matter.

The Respondent agrees to fully comply in good faith with all provisions of Chapter 42.17 RCW in the future.

Respectfully submitted this 24<sup>th</sup> day of March, 2004.

/s/

3/24/04

\_\_\_\_\_  
Vicki Rippie, Executive Director

\_\_\_\_\_  
Date

/s/

3/24/04

\_\_\_\_\_  
Shirley Wilcox, Chair  
Grays Harbor County Democratic Central Committee  
Stipulation of Facts, Violations and Penalty  
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\_\_\_\_\_  
Date